

Thank you for your comment, Dru Buntin.

The comment tracking number that has been assigned to your comment is GLMRISBRS50007.

Comment Date: January 26, 2015 11:23:01AM  
GLMRIS Brandon Road Scoping  
Comment ID: GLMRISBRS50007

First Name: Dru  
Middle Initial:  
Last Name: Buntin  
Organization: Upper Mississippi River Basin Association  
Address:  
Address 2:  
Address 3:  
City:  
State:  
Zip: 55102  
Country:  
Attachment: interbasin-aquatic-nuisance-species-prevention-and-control-resolution-2-25-2014.pdf

Comment Submitted:

Attached for your reference is a resolution entitled "Interbasin Aquatic Nuisance Species Prevention and Control." This resolution was adopted by the Board of the Upper Mississippi River Basin Association (UMRBA) on February 25, 2014 following the release of the Great Lakes and Mississippi River Interbasin Study report, but the resolution is relevant to the NEPA scoping being conducted for Brandon Road.

Please feel free to contact me with any questions.

Dru Buntin  
Executive Director  
Upper Mississippi River Basin Association



# Upper Mississippi River Basin Association

## Interbasin Aquatic Nuisance Species Prevention and Control Resolution

(Feb. 25, 2014)

**Whereas**, the existing and potential impacts of aquatic nuisance species on the Upper Mississippi River System are substantial, affecting a broad range of river resources and uses, including native biota, water quality, commercial navigation, and recreational boating; and

**Whereas**, the profile of aquatic nuisance species issues has increased markedly in recent years, with decision makers and the public particularly focused on the potential spread of Asian carp from the Mississippi and Illinois Rivers to the Great Lakes Basin and to high value inland waters within the Upper Mississippi River Basin; and

**Whereas**, several methods are currently being explored to prevent, monitor, and control aquatic nuisance species spread both within and between the Upper Mississippi River and Great Lakes basins, but these methods also have implications for ecosystem health and human uses, such as commercial navigation, water quality, flood risk management, and recreation; and

**Whereas**, the U.S. Army Corps of Engineers has released the *Great Lakes and Mississippi River Interbasin Study* (GLMRIS) report presenting a range of eight options to reduce risk of aquatic nuisance species movement between the Great Lakes and Mississippi River basins, including two alternatives for full hydrological separation; and

**Whereas**, the U.S. Army Corps of Engineers did not recommend a preferred alternative in the GLMRIS report, but rather emphasized that continued participation by stakeholders is essential to reach a decision and gain authorization for a collaborative path forward; and

**Whereas**, the Upper Mississippi River Basin States seek to limit aquatic nuisance species populations and impacts through effective, affordable, safe prevention and control methods; and

**Whereas**, the most effective means of controlling the impacts of aquatic nuisance species is through prevention; and

**Whereas**, the Upper Mississippi River Basin States are committed to working collaboratively with interested partners to identify short-term steps that can be implemented quickly to reduce the risk of spread of aquatic nuisance species while continuing to analyze and build consensus around long-term solutions; and

**Therefore, Be it Resolved**, that the Upper Mississippi River Basin States assert that significant additional analysis and information regarding water quality, flood risk reduction, and commercial navigation impacts and mitigation is required before Congress should consider authorization of any of the structural alternatives presented in the GLMRIS report; and

**Be it Further Resolved**, that the Upper Mississippi River Basin States support action on a suite of near-term measures and further analysis to reduce the risk of Asian carp and other invasive species passing through the Chicago Area Waterways System, including:

- continued implementation of the Asian Carp Control Strategy Framework and related efforts;
- immediate implementation of additional non-structural control measures outlined in the GLMRIS alternative two (such as use of chemical controls, ballast and bilge management, habitat alternation, and controlled harvesting);
- design, engineering and testing of the “GLMRIS lock,” as a national demonstration project, to determine its viability, effectiveness and cost in preventing aquatic nuisance species transfer; and

**Be it Further Resolved**, that efforts to develop and reach regional consensus on long-term aquatic nuisance species solutions should be continued and should include input from potentially affected stakeholders within both the Mississippi River and Great Lakes basins; and

**Be it Further Resolved**, that the Upper Mississippi River Basin States support reasonable and appropriate regulatory and non-regulatory prevention measures that protect U.S. waters from the detrimental effects of aquatic nuisance species and the high costs of control and management; and

**Be it Finally Resolved**, that long-term solutions must couple the regional priority to prevent interbasin movement of aquatic nuisance species with priorities to prevent flooding, protect water quality, and enhance waterways for recreation and commercial transportation.

*Adopted by the Upper Mississippi River Basin Association Board on February 25, 2014.*